

Honorable Judge James L. Robart

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

BOMBARDIER INC.,

Plaintiff,

v.

mitsubishi aircraft corporation,
mitsubishi aircraft corporation
america inc., aerospace testing
engineering & certification inc.,
michel korwin-szymanowski,
laurus basson, marc-antoine
delarche, cindy dornéval, keith
ayre, and john and/or jane does 1-
88.

Defendants.

No. 2:18-cv-01543-JLR

BOMBARDIER INC.'S
RESPONSE TO MITSUBISHI
AIRCRAFT CORPORATION
AMERICA INC.'S MOTION TO
SEAL UPDATED OPPOSITION
TO PLAINTIFF'S MOTION FOR
PRELIMINARY INJUNCTION

**NOTE ON MOTION
CALENDAR:
MAY 24, 2019**

INTRODUCTION AND ARGUMENT

Plaintiff Bombardier Inc. ("Bombardier") hereby responds to Defendant Mitsubishi Aircraft Corporation America, Inc.'s ("MITAC America") Motion to Seal Updated Opposition to Plaintiff's Motion for Preliminary Injunction, filed on May 7, 2019. (Dkt. No. 147, "Motion to Seal.") Pursuant to the Stipulated Protective Order (Dkt. No. 109), Fed. R. Civ. P. 26, and Local Civil Rule 5, Bombardier respectfully requests to keep under seal certain information referenced in MITAC America's Updated Opposition to Bombardier's Updated Motion for Preliminary Injunction, Dkt. No. 148 ("Redacted Updated Opposition"), subsequently re-filed as Dkt. No. 198.

1 As MITAC America correctly notes (Dkt. No. 147, at 2), this Court already ruled that
 2 certain portions of MITAC America's earlier Opposition to Bombardier's Motion for
 3 Preliminary Injunction should remain sealed from the public record. (*See generally*, Dkt. No.
 4 111.) MITAC America requests that the "same language [from the previous Opposition] be
 5 redacted in its updated Opposition." (Dkt. No. 147, at 2.) Bombardier agrees that at least this
 6 information, as well as the additional redactions identified in Dkt. No. 198, should remain
 7 redacted and accordingly sealed from public viewing consistent with and for the same reasons
 8 outlined by this Court in its earlier Order on the Motions to Seal. (Order, Dkt. No. 111.)

9 CONCLUSION

10 For the foregoing reasons, Bombardier respectfully requests to keep under seal certain
 11 information referenced and redacted in MITAC America's Updated Opposition to
 12 Bombardier's Updated Motion for Preliminary Injunction, Dkt. No. 198.

13
 14 Dated this 20th day of May, 2019.

15
 16 CHRISTENSEN O'CONNOR
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CERTIFICATE OF SERVICE

I hereby certify that on May 20, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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